

### **REMARKS**

Reconsideration and allowance in view of the proposed claim amendments and the following remarks are respectfully requested.

Claims 1-22 and 27-29 remain pending, claims 9, 13-18, 21 and 27-29 having been amended.

#### **Rejection of Claims 1-22 and 27-29**

On page 2 of the non-Final Office Action of December 28, 2005, the Examiner rejected claims 1-22 and 27-29 as allegedly being unpatentable over U.S. Patent No. 5,748,789 to Lee et al. ("Lee") in view of U.S. Patent No. 6,516,090 to Lennon et al. ("Lennon"). Applicant respectfully traverses the rejection with respect to claims 1-8. Applicants submit that the amendments to claims 9, 13, 15, 18, 21 and 27-29 obviate the rejection. The remaining claim amendments were made to conform each claim with its corresponding independent claim.

Independent claim 1 is directed to a method of encoding video content. The method includes, among other things, routing each video content portion to one of a plurality of encoders based on a model associated with each video content portion.

As mentioned in the Remarks of the Amendment of July 12, 2005, Lee fails to disclose or suggest routing each video content portion to one of a plurality of encoders based on a model associated with each video content portion. Lennon also fails to satisfy the deficiency of Lee. Therefore, Applicants submit that claim 1 is patentable over Lee in view of Lennon. Further, Applicant notes that in the non-Final Office Action of December 28, 2005, the Examiner did not even mention the feature of routing each video content portion to one of a plurality of encoders based on a model associated with each video content portion, as required by claim 1. In other words, the Office Action was completely silent with respect to any assertion that Lee, Lennon, or any other reference, either separately or in any

combination disclosing or suggesting the feature of routing each video content portion to one of a plurality of encoders based on a model associated with each video content portion, as required by claim 1.

For at least the reasons discussed above, Applicant submits that claim 1 and dependent claims 2-8 are patentable over Lee in view of Lennon and respectfully requests that the rejection of claims 1-8 be withdrawn.

Amended claim 9 is directed to a method of encoding video content. The method includes, among other things, assigning a predefined encoder model to each video portion according to a characteristic of the video portion, wherein the predefined encoder model is chosen from a plurality of predefined encoder models or a generic encoder model. Applicant submits that the cited references fail to disclose or suggest this feature.

On pages 3 and 4 of the Office Action, the Examiner admitted that Lee fails to disclose the predefined model being selected from a plurality of predefined models. The Examiner relied on Lennon to disclose this feature. According to the Examiner, on page 4 of the Office Action, “Lennon disclose that regions can be separately coded where there are model parameters for each separately coded region.” However, Applicant submits that neither Lee nor Lennon disclose or suggest, either separately or in combination, predefined encoder models being selected from a plurality of predefined encoder models. Further, neither Lee nor Lennon disclose or suggest assigning a predefined encoder model to each video portion according to a characteristic of the video portion, where the predefined encoder model is chosen from a plurality of predefined encoder models or a generic encoder model, as required by claim 9.

For at least the reasons discussed above, Applicant respectfully requests that the rejection of claim 9 and dependent claims 10-12 be withdrawn.

Amended claim 13 is similar to amended claim 9. Applicants submits that claim 13 is patentable over Lee in view of Lennon for at least similar reasons to those provided with

respect to claim 9. Therefore, Applicant respectfully requests that the rejection of claim 13 and dependent claim 14 be withdrawn.

Amended claim 15 is directed to a method of encoding video content divided into a plurality of portions, each portion being associated with either a generic encoder model or an encoder model chosen from a plurality of predefined encoder models. The method includes, among other things, routing each portion associated with an encoder model of the plurality of predefined encoder models to an encoder associated with the chosen encoder model. Applicant submits that neither Lee nor Lennon disclose or suggest, separately or in any combination, routing each portion associated with an encoder model of the plurality of predefined encoder models to an encoder associated with the chosen encoder model, as required by claim 15. Therefore, Applicant respectfully requests that the rejection of claim 15 and dependent claims 16 and 17 be withdrawn.

Amended claim 18 is similar to amended claim 15. Applicants submits that claim 18 is patentable over Lee in view of Lennon for at least similar reasons to those provided with respect to claim 15. Therefore, Applicant respectfully requests that the rejection of claim 18 and dependent claims 19 and 20 be withdrawn.

Amended claim 21 is directed to a method of encoding a bitstream using a plurality of encoders. The method includes, among other things, routing the extracted and mapped segments to one of the plurality of encoders based on the mapping to the respective predefined encoder model. Applicant submits that neither Lee nor Lennon disclose or suggest, either separately or in any combination, the above-mentioned feature required by claim 21. Therefore, Applicant respectfully requests that the rejection of claim 21 and dependent claim 22 be withdrawn.

Claims 27-29 are directed to a coded bitstream having portions of the bitstream encoded using different encoders according to encoder models associated with a subject matter of each portion of the bitstream, the coded bitstream encoded according to the method

of claims 1, 18 and 21, respectively. Applicant submits that neither Lee nor Lennon disclose or suggest, separately or in any combination, encoding portions of a bitstream according to encoder models associated with a subject matter of each portion of the bitstream. Further, Applicants submit that claims 27-29 are patentable for reasons similar to those discussed with respect to claims 1, 18 and 21. Therefore, Applicant respectfully requests that the rejection of claims 27-29 be withdrawn.

### **CONCLUSION**

Having addressed all rejections, Applicant respectfully submits that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

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